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January 18, 2022
1/19/22

MEMO ENDORSED

File via ECF and Email

Hon. Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Defendant Peguero's deadline to
file motions is extended to Feb. 28, 2022.
Colleen McMahon

Re: U.S. v. Adiel Peguero
21 Cr. 541 (CM)

Dear Judge McMahon:

Counsel was recently appointed to represent Mr. Peguero, pursuant to the Criminal Justice Act. I write to respectfully request a one-month adjournment of the current motion schedule, which I understand sets January 28th as the date for filing defense motions.

Since my appointment in late December, 2021, connecting with Mr. Peguero – whether by telephone or an in-person – has been challenging. Indeed, today was the first time that my previously scheduled phone calls with Mr. Peguero were not canceled by the jail. And, while he and I made the most of the hour that we were assigned, there is still much work to be done.

I have discussed my request with AUSA Danielle Kudla and AUSA Alexander Li, and they do not object to this request.

Accordingly, I respectfully request an extension of the current motion schedule until February 28, 2022, or such time thereafter as the Court deems appropriate.

Your Honor's attention to this request is greatly appreciated.

Respectfully submitted,

Susan G. Kellman

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cc: All counsel

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